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11 *Counsel for Defendants*

12 FORTRESS INVESTMENT GROUP LLC,
FORTRESS CREDIT CO. LLC,
13 VLSI TECHNOLOGY LLC

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16
17 INTEL CORPORATION and APPLE INC.,

18 Plaintiffs,

19 v.

20 FORTRESS INVESTMENT GROUP LLC,
FORTRESS CREDIT CO. LLC, UNILOC
21 2017 LLC, UNILOC USA, INC., UNILOC
LUXEMBOURG S.A.R.L., VLSI
22 TECHNOLOGY LLC, INVT SPE LLC,
INVENTERGY GLOBAL, INC., DSS
23 TECHNOLOGY MANAGEMENT, INC., IXI
IP, LLC, and SEVEN NETWORKS, LLC,

24 Defendants.
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Case No. 3:19-cv-07651-EMC

**DECLARATION OF A. MATTHEW
ASHLEY IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES TO
RESPOND TO THE COMPLAINT AND
SET MOTIONS TO DISMISS, STRIKE
AND/OR STAY THE ACTION BRIEFING
SCHEDULE**

1 I, A. Matthew Ashley, declare as follows:

2 1. I am an attorney at law, admitted to practice in the United States District Court,
3 Northern District of California, and I am a partner with the law firm of Irell & Manella LLP,
4 counsel for Fortress Investment Group LLC, Fortress Credit Co. LLC, and VLSI Technology LLC
5 in this matter. I have personal knowledge of each fact stated in this declaration and, if called as a
6 witness, I could and would competently and truthfully testify thereto.

7 2. Plaintiffs Intel Corporation and Apple Inc. served summonses on each of the
8 defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, and VLSI Technology LLC
9 on November 25, 2019, and I have been informed that defendants Uniloc 2017 LLC, Inventergy
10 Global, Inc., INVT SPE LLC, DSS Technology Management, Inc., IXI IP, LLC, and Seven
11 Networks, LLC (collectively, "Defendants") received summonses on November 25, 2019.

12 3. The parties have met and conferred over a stipulation to extend Defendants'
13 deadlines to respond to the Complaint.

14 4. Defendants anticipate that they may respond to the Complaint by way of motions to
15 dismiss, strike and/or stay the action, and the parties have agreed on a briefing schedule that will
16 govern such motion practice, subject to Court approval.

17 5. Neither the parties' proposed extension of Defendants' deadlines to respond to the
18 Complaint nor the proposed briefing schedule will change or alter the date of any event or
19 deadline already fixed by Court order.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct.

22 Executed on December 12, 2019 at Newport Beach, California.

23 By: /s/ A. Matthew Ashley
24 A. Matthew Ashley